Summary of Changes to LTCP in Response to Public Comment
August 31, 2006

Executive Summary: Non-substantive changes were made to pages 2 and 19 to remove references to public comment period.

Section 1: Minor change to page 1 to remove reference to public comment version of plan.

Section 2: Corrected redundant references to pesticides on pages 2-5 and 2-103.

Section 3: Reference to chemical formula for ozone deleted from page 3-14.

Section 4: No changes

Section 5: Public Works Board and advisory committee members updated. Added new Section 5.9 to document 2006 public comment period, comments received and city's responses.

Section 6: No changes.

Section 7: Three changes:

Table 7-5/Exhibit 1 – Edits to Footnote 6:

> [6] CSO Control Measures will be designed to achieve Performance Criteria of 97 percent capture for the Fall Creek watershed and 95 percent capture for other CSO receiving waters, and 2 CSO events for the Fall Creek watershed and 4 CSO events for each of the other CSO receiving waters in a "typical year." "Typical year" performance, and achievement of Performance Criteria, shall be assessed in accordance with Section 8.4 (Post-Construction Monitoring) using the average annual statistics generated by the collection system model for the representative five-year simulation period of 1996 to 2000 (or another ~~subsequently approved~~ five-year simulation period subsequently proposed by the city and approved by IDEM and U.S. EPA~~). in accordance with Section 8.4 (Post-Construction Monitoring)~~

7.3.2 Fall Creek Control Measures: A new paragraph was added to explain how the city will prevent and detect groundwater contamination from the tunnel. The paragraph reads:

> Because groundwater is such an important resource for the City of Indianapolis, the city will take all necessary steps to prevent groundwater contamination during construction and operation of the deep tunnel along Fall Creek and White River. The city's Groundwater Management Plan includes the following components: 1) reviewing available groundwater data to evaluate where groundwater impacts might occur along the preliminary tunnel alignments; 2) developing a calibrated groundwater model to evaluate alternatives for tunnel construction in the bedrock; 3) developing a groundwater risk registry and mitigation controls to be considered during construction and future operation; and 4) reviewing specialized construction techniques to protect groundwater. The plan also includes information on recommended groundwater monitoring both during and after tunnel construction to verify groundwater protection.

7.4.3 Aquatic Life Use Attainment: Subtitle and final sentence were edited to clarify the goal is to eliminate the dissolved oxygen impairment.

> **7.4.3 Dissolved Oxygen Standard ~~Aquatic Life Use~~ Attainment**
>
> The selected plan is expected to eliminate violations of the 4.0 mg/L dissolved oxygen standard by achieving 95 percent capture in White River and 97 percent capture on Fall Creek. The city also plans to remove Boulevard Dam in Fall Creek, modify Chevy and Stout dams in White River, and provide aeration, if needed, within White River and Fall Creek to ensure attainment of the dissolved oxygen standard. This is expected to ensure sufficient dissolved oxygen to support a vigorous aquatic community in affected waterways."~~fully restore aquatic life uses in waterways affected by CSOs.~~

Section 8: No changes.

Section 9: First two paragraphs were edited to read:

> ~~While complete elimination of combined sewer overflows would be both unaffordable and infeasible, t~~The selected long-term control plan will achieve an extremely high level of CSO control, resulting ~~. Specifically, the LTCP is expected to result~~ in the capture of 95-97 percent of CSO volumes after full program implementation. This is an extraordinary level of control of urban stormwater throughout the CSO area.
>
> "Nevertheless, a few residual CSOs will occur during storms that exceed the LTCP design and performance criteria. This will result in limited periods when CSOs would combine with other pollutant sources (and issues, such as stream flow/velocity) to make urban waters unsuitable for recreational use. ~~To address this reality, f~~Federal and state laws provide a process for refining designated uses through a Use Attainability Analysis (UAA). The UAA is an analysis to identify attainable use designations for CSO receiving waters."

Section 9.4.1: First sentence in first paragraph was edited to read "during and after wet weather events."

> Not surprisingly in these urban waters, there are human-caused conditions and sources of pollution that prevent full attainment of the recreational use during and after wet weather events.